

Stueve Siegel Hanson LLP

Norman E. Siegel, MO Bar # 44378

siegel@stuevesiegel.com

Christopher D. Dandurand, MO Bar # 63775

dandurand@stuevesiegel.com

460 Nichols Road, Suite 200

Kansas City, MO 64112

(816) 714-7100

(816) 714-7101 Facsimile

Attorneys for Plaintiff, Matthew Alexander,
for himself and other members of the general
public similarly situated

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Matthew Alexander,

Plaintiff,

vs.

GNLV, Corp.

GNL, Corp.,

Defendants.

Docket No. 2:13-cv-02005-LDG-CWH

**PLAINTIFF'S MOTION TO FILE
UNDER SEAL PLAINTIFF
MATTHEW ALEXANDER'S
SUGGESTIONS IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS
FIRST AMENDED COMPLAINT**

Plaintiff Matthew Alexander, for himself and other members of the general public similarly situated, by and through undersigned counsel hereby moves the Court for an entry of an Order to file under seal Plaintiff Matthew Alexander's Suggestions in Opposition to Defendants' Motion to Dismiss First Amended Complaint. As support for this Motion, Plaintiff states as follows:

1 1. Plaintiff and third party Epicor Retail have agreed to abide by the terms of a
2 protective order entered by the Court. [Doc. 47]

3 2. Pursuant to the terms of the protective order, deposition transcripts are
4 automatically treated as containing confidential information for the first thirty days after the
5 transcript is released.

6 3. Plaintiff is filing his Suggestions in Opposition to Defendants' Motion to Dismiss
7 First Amended Complaint which contains information obtained at the deposition of Epicor
8 Retail, which occurred less than thirty days ago and therefore the information is required to be
9 treated as confidential. In order to comply with the terms of the protective order, Plaintiff
10 requests that the Court allow Plaintiff's Opposition to be filed under seal.
11

12 4. Plaintiff believes that the burden is on Epicor to establish that the information
13 designated as confidential pursuant to the agreement is entitled to heightened protection.
14 Nonetheless, Plaintiff requests that the Court file under seal Plaintiff Matthew Alexander's
15 Suggestions in Opposition to Defendants' Motion to Dismiss First Amended Complaint so that
16 Plaintiff can comply with the protective order.
17

18 5. Accordingly, Plaintiff respectfully requests that the Court enter an Order filing
19 Plaintiff Matthew Alexander's Suggestions in Opposition to Defendants' Motion to Dismiss First
20 Amended Complaint under seal.
21

22 Dated: October 2, 2014

STUEVE SIEGEL HANSON LLP

/s/ Christopher D. Dandurand

Norman E. Siegel, MO Bar # 44378

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dandurand@stuevesiegel.com

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Kansas City, MO 64112

(816) 714-7100

(816) 714-7101 Facsimile

DiPasquale Moore, LLC

Michael DiPasquale, MO Bar # 58479

mdipasquale@dmlawkc.com

Jason B. Moore, MO Bar # 54592

jmoore@dmlawkc.com

4050 Pennsylvania Avenue, Suite 115

Kansas City, MO 64111

(816) 888-7501

(816) 888-7519 Facsimile

Brian D. Nettles, Esq.

Nevada Bar No. 7462

Nettles Law Firm

1389 Galleria Drive, Suite 200

Henderson, Nevada 89012

(702) 434-8282

(702) 434-1488 Facsimile

briandnettles@nettleslawfirm.com

Attorneys for Plaintiff, Matthew Alexander,
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on October 2, 2014, a copy of the
foregoing document was served via ECF to the counsel of record in this case.

ORDER

IT IS SO ORDERED.

/s/ Christopher D. Dandurand
Attorney for Plaintiff

DATED this 25 day of November, 2014.



Lloyd D. George
Sr. U.S. District Judge